

IN RE:	:	
RICHARD HORACE COLE, JR.	:	CASE NO. 1:22-bk-01049-HWV
SHARI W. COLE	:	
	:	
Debtors	:	
	:	
	:	CHAPTER 13
SANTANDER CONSUMER USA INC.	:	
dba CHRYSLER CAPITAL	:	
Movant	:	
	:	
v.	:	
	:	
RICHARD HORACE COLE, JR.	:	
SHARI W. COLE	:	
	:	
Respondents	:	

AND NOW, come Debtors, Richard Horace Cole, Jr. and Shari W. Cole, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

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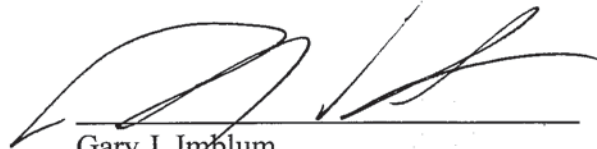
paid through the Plan and, further, the arrearage to the Trustee is admitted.

Debtors will make an offer to bring the Trustee current in the near future.

5. A. Admitted in part and denied in part. Debtors will make an offer to bring the payments current with the Trustee. That will result in the Movant being adequately protected.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 6/23/23

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF SANTANDER CONSUMER USA INC., dba CHRYSLER CAPITAL FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

WILLIAM E. CRAIG, ESQUIRE
MORTON & CRAIG LLC
COUNSEL FOR MOVANT
VIA E-SERVICE

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For Debtors

DATED: 6/23/2023